



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

November 30, 2021

**VIA ECF**

The Honorable Loretta A. Preska  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Vitaly Fargesen and Igor Palatnik*, 21 Cr. 602 (LAP)

Dear Judge Preska:

The Government writes to respectfully request an additional month to complete its Rule 16 discovery production. During the November 4, 2021 conference in this matter, the Government proposed, and the Court accepted, a Rule 16 discovery production deadline of December 3, 2021. While the Government believes it will substantially complete its Rule 16 production by December 3, 2021, the Government has identified additional data to review for potential Rule 16 material and, given the volume of that data, cannot complete a review by December 3, 2021. Accordingly, in order to facilitate an orderly review of the additional data and to permit the Government to make any discovery productions that may be required, the Government respectfully requests until January 3, 2022, to meet its Rule 16 obligations.

Counsel to each defendant has consented to this request.


SO ORDERED

  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

12/1/21

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:   
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cc: All defense counsel (by ECF)